

**WONG FLEMING**

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January 15, 2014

**VIA EMAIL**

Hon. Richard J. Sullivan, U.S.D.J.  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Room 640  
New York, NY 10007  
E-mail: [SullivanNYSDChambers@nysd.uscourts.gov](mailto:SullivanNYSDChambers@nysd.uscourts.gov)

**Re: Constellation NewEnergy, Inc. v. Allentown Metal Works, Inc., et al.,**  
**Civil Action No. 13-civ-03281-RJS**

Dear Judge Sullivan:

This firm represents Plaintiff, Constellation NewEnergy, Inc. ("CNE") in the above-referenced matter. In accordance with Your Honor's Individual Practice Rule 2, we are writing to request a Pre-Motion Conference for leave to serve a motion to enforce Your Honor's November 4, 2013 Order granting CNE attorney's fees and costs.

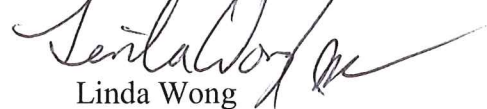
Despite the Court's Order and Plaintiff's correspondence with Defendants' counsel specifying the amount of fees and costs involved with Plaintiff's Motion for Default Judgment, Defendants have yet to comply with the Court's Order. Defendants' counsel has further indicated that it will not pay the fees demanded.

In light of the foregoing, we request that the Court schedule a pre-motion conference in this matter.

Thank you for Your Honor's consideration.

Respectfully,

**WONG FLEMING**



Linda Wong

LW/IC/ncs

File No. 2516.0008

cc: Scott A. Brody, Esq. (via electronic mail to [scott.brody@brodyoconnor.com](mailto:scott.brody@brodyoconnor.com))

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